Refined Metals Corporation

December 6, 2006

Ms. Ruth Jean Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re: Progress Report No. 98 (November 2006) SWMU Closure Refined Metals Corporation (RMC) Beech Grove, Indiana



Dear Ms. Jean:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of November 2006 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During November 2006 to Comply with the Consent Decree
- On November 2, 2006, Refined Metals Corporation (RMC) submitted to IDEM the progress report for October 2006.
- Other activities performed during the month of November 2006 included the following:
 - > RMC awaited IDEM comments regarding the Comprehensive Closure Investigation Report and the latest version of the Groundwater Monitoring Plan.
- 2. Results of Sampling and Tests and Other Data Received During November 2006
- No sampling, tests, or other data was received during November 2006.
- 3. Percentage of Closure Completed as of November 30, 2006
- As of November 30, 2006, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved by IDEM on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was submitted to IDEM on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing

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certain deficiencies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report.

On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments on the October 2, 2001 version of the Closure Investigation Report. On May 7, 2002, RMC submitted the Supplemental Closure Investigation Report to IDEM. On November 21, 2003, IDEM issued a Notice of Deficiency regarding the Supplemental Closure Investigation Report. On February 11, 2004, RMC issued a response to the Notice of Deficiency dated November 21, 2003, including a Groundwater Monitoring Plan. Pursuant to a request by IDEM, on March 25, 2004 RMC submitted proposed soil delineation concentrations to IDEM. On June 8, 2004, IDEM issued a Notice of Deficiency regarding the Groundwater Monitoring Plan. On June 18, 2004, IDEM issued a Notice of Deficiency regarding the proposed soil delineation concentrations. On August 6, 2004, RMC issued a letter responding to IDEM's comment letter dated June 8, 2004. On August 13, 2004, RMC issued a letter responding to IDEM's comment letter dated June 18, 2004. On February 14, 2005, IDEM issued a Notice of Deficiency regarding the August 6, 2004 submittal and a comment letter regarding the August 13, 2004 submittal. On June 13, 2005, RMC issued a response to IDEM's February 14, 2005 letter regarding the Groundwater Monitoring Plan (RMC's August 6, 2004 submittal). On July 18, 2005, RMC issued a response to IDEM's February 14, 2005 letter regarding soil delineation concentrations. On August 25, 2005, IDEM approved soil delineation concentrations proposed by RMC. On October 21, 2005, RMC copied IDEM on the Phase II Corrective Measures (CMS) Study Report submitted to the EPA. The Phase II CMS Report evaluates alternatives for remediation of the entire property (including the SWMUs) and recommends one particular alternative. On November 23, 2005, IDEM issued comments regarding the June 13, 2005 version of the Sampling and Analysis Plan for Groundwater Monitoring submitted by RMC. On December 23, 2005, RMC submitted a copy of the Baseline Human Health Risk Assessment report prepared for the EPA to IDEM along with a request that IDEM review the report. On January 27, 2006, RMC issued a response to IDEM's November 23, 2005 comments regarding the Sampling and Analysis Plan for Groundwater Monitoring. On April 11, 2006, RMC submitted a Comprehensive Closure Investigation Report. On July 20, 2006, RMC submitted a revised Groundwater Monitoring Plan. On August 29, 2006, IDEM issued comments on the Baseline Human Health Risk Assessment report. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. <u>Modifications to Work Plans Proposed to or Approved by IDEM during November</u> 2006
- No modifications to work plans were proposed to or approved by IDEM during November 2006.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for December 2006
- RMC will continue to await IDEM comments regarding the Comprehensive Closure Investigation Report and the Groundwater Monitoring Plan.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- No community relations activities were conducted during November 2006.

Sincerely,

REFINED METALS CORPORATION

Matthew A. Love

cc: Jonathan Adenuga - EPA Paul Stratman

Refined Metals Corporation

June 5, 2004

Ms. Ruth Jean Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re: Progress Report No. 68 (May 2004) SWMU Closure Refined Metals Corporation Beech Grove, Indiana

Dear Ms. Jean:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of May 2004 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During May 2004 to Comply with the Consent Decree
- On May 5, 2004, Refined Metals (RMC) submitted the progress report for April 2004.
- 2. Results of Sampling and Tests and Other Data Received During May 2004
- No results and/or data were received in May 2004.
- 3. Percentage of Closure Completed as of May 31, 2004
- As of March 31, 2004, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain deficiencies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report.

On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments on the October 2, 2001 version of the Closure Investigation Report. On May 7, 2002, RMC submitted the Supplemental Closure Investigation Report to IDEM. On November 21, 2003, IDEM issued a Notice of Deficiency regarding the Supplemental Closure Investigation Report. On February 11, 2004, RMC issued a response to the Notice of Deficiency dated November 21, 2003. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During May 2004
- No modifications to Work Plans were proposed or approved during May 2004.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for June 2004
- No closure activities are scheduled pending IDEM response to documents submitted by RMC and/or AGC.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- No community relations activities were conducted in May 2004.

Sincerely,

REFINED METALS CORPORATION

Matthew A. Love

cc: Jonathan Adenuga - EPA

Paul Stratman

Refined Metals Corporation

May 5, 2004

Ms. Ruth Jean Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re: Progress Report No. 67 (April 2004) SWMU Closure Refined Metals Corporation Beech Grove, Indiana

Dear Ms. Jean:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of April 2004 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During April 2004 to Comply with the Consent Decree
- On April 2, 2004, Refined Metals (RMC) submitted the progress report for March 2004.
- 2. Results of Sampling and Tests and Other Data Received During April 2004
- No results and/or data were received in April 2004.
- 3. Percentage of Closure Completed as of April 30, 2004
- As of March 31, 2004, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain deficiencies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report.

On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments on the October 2, 2001 version of the Closure Investigation Report. On May 7, 2002, RMC submitted the Supplemental Closure Investigation Report to IDEM. On November 21, 2003, IDEM issued a Notice of Deficiency regarding the Supplemental Closure Investigation Report. On February 11, 2004, RMC issued a response to the Notice of Deficiency dated November 21, 2003. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During April 2004
- No modifications to Work Plans were proposed or approved during April 2004.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for May 2004
- No closure activities are scheduled pending IDEM response to documents submitted by RMC and/or AGC.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- No community relations activities were conducted in April 2004.

Sincerely,

REFINED METALS CORPORATION

Matthew A. Love

cc: Jonathan Adenuga - EPA

Paul Stratman

Refined Metals Corporation

June 9, 2003

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 56 (May 2003)

SWMU Closure

Refined Metals Corporation Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of May 2003 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During May 2003 to Comply with the Consent Decree
- On May 13, 2003, Refined Metals (RMC) submitted the progress report for April 2003.
- 2. Results of Sampling and Tests and Other Data Received During May 2003
- No results and/or data were received in May 2003.
- 3. Percentage of Closure Completed as of May 31, 2003
- As of May 31, 2003, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report.

On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. On May 7, 2002, RMC submitted the Supplemental Closure Investigation Report to

257 West Mallory Avenue • Memphis, Tennessee 38109 3700 S. Arlington Avenue • Beech Grove, Indiana 46203 Mailing Address: 3000 Montrose Avenue • Reading, PA 19605

IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During May 2003
- No modifications to Work Plans were proposed or approved during May 2003.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for June 2003
- No tasks or actions are scheduled until IDEM has completed its review of the Supplemental Closure Investigation Report.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

REFINED METALS CORPORATION

Matthew A. Love

cc: Jonathan Adenuga - EPA Paul Stratman

Refined Metals Corporation

April 9, 2003

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 54 (March 2003)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of March 2003 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During March 2003 to Comply with the Consent Decree
- On March 3, 2003, Refined Metals (RMC) submitted the progress report for February 2003.
- 2. Results of Sampling and Tests and Other Data Received During March 2003
- No results and/or data were received in March 2003.
- 3. Percentage of Closure Completed as of March 31, 2003
- As of March 31, 2003, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report.

On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. On May 7, 2002, RMC submitted the Supplemental Closure Investigation Report to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During March 2003
- No modifications to Work Plans were proposed or approved during March 2003.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for April 2003
- No tasks or actions are scheduled until IDEM has completed its review of the Supplemental Closure Investigation Report.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

REFINED METALS CORPORATION

Matthew A. Love

cc: Jonathan Adenuga - EPA

Paul Stratman



December 12, 2002

Exide Technologies 3000 Montrose Avenue Reading, PA 19605

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 50 (November 2002)

SWMU Closure

Refined Metals Corporation Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of November 2002 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During November 2002 to Comply with the Consent Decree
- On November 6, 2002, Refined Metals (RMC) submitted the progress report for October 2002.
- 2. Results of Sampling and Tests and Other Data Received During November 2002
- No results and/or data were received in November 2002.
- 3. Percentage of Closure Completed as of November 30, 2002
- As of November 30, 2002, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. On May 7, 2002, RMC submitted the Supplemental Closure Investigation Report to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During November 2002
- No modifications to Work Plans were proposed or approved during November 2002.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for December 2002
- No tasks or actions are scheduled until IDEM has completed its review of the Supplemental Closure Investigation Report.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs

Some for

cc: Jonathan Adenuga - EPA Paul Stratman



October 2, 2002

Exide Technologies 3000 Montrose Avenue Reading, PA 19605 www.exideworld.com

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

> Re: Progress Report No. 48 (September 2002) SWMU Closure Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of September 2002 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During September 2002 to Comply with the Consent Decree
- On September 3, 2002, Refined Metals (RMC) submitted the progress report for August 2002.
- 2. Results of Sampling and Tests and Other Data Received During September 2002
- No results and/or data were received in September 2002.
- 3. Percentage of Closure Completed as of September 30, 2002
- As of September 30, 2002, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. On May 7, 2002, RMC submitted the Supplemental Closure Investigation Report to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

Mrs. Rebecca Joniskan, CHMM October 2, 2002

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During September 2002
- No modifications to Work Plans were proposed or approved during September 2002.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for October 2002
- No tasks or actions are scheduled until IDEM has completed its review of the Supplemental Closure Investigation Report.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs

Jonathan Adenuga - EPA Paul Stratman



September 3, 2002

Exide Technologies 3000 Montrose Avenue Reading, PA 19605 www.exideworld.com

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 47 (August 2002)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of August 2002 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During August 2002 to Comply with the Consent Decree
- On August 7, 2002, Refined Metals (RMC) submitted the progress report for July 2002.
- 2. Results of Sampling and Tests and Other Data Received During August 2002
- No results and/or data were received in August 2002.
- 3. Percentage of Closure Completed as of August 31, 2002
- As of August 31, 2002, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. On May 7, 2002, RMC submitted the Supplemental Closure Investigation Report to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During August 2002
- No modifications to Work Plans were proposed or approved during August 2002.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for September 2002
- No tasks or actions are scheduled until IDEM has completed its review of the Supplemental Closure Investigation Report.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs

cc: Jonathan Adenuga - EPA Paul Stratman



August 7, 2002

Exide Technologies 3000 Montrose Avenue Reading, PA 19605 www.exideworld.com

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re: Progress Report No. 46 (July 2002)

SWMU Closure

Refined Metals Corporation Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of July 2002 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During July 2002 to Comply with the Consent Decree
- On July 3, 2002, Refined Metals (RMC) submitted the progress report for June 2002.
- A community newsletter was generated in July 2002 and submitted to list of interested individuals as provided by IDEM and USEPA.
- 2. Results of Sampling and Tests and Other Data Received During July 2002
- No results and/or data were received in July 2002.
- 3. Percentage of Closure Completed as of July 31, 2002
- As of July 31, 2002, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. On May 7, 2002, RMC submitted the Supplemental Closure Investigation Report to IDEM. The percentage of

Mrs. Rebecca Joniskan, CHMM August 7, 2002

Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During July 2002
- No modifications to Work Plans were proposed or approved during July 2002.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for August 2002
- No tasks or actions are scheduled until IDEM has completed its review of the Supplemental Closure Investigation Report.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- A community newsletter was generated in July 2002 and submitted to list of interested individuals as provided by IDEM and USEPA.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs

cc:

Jonathan Adenuga - EPA Paul Stratman



May 7, 2002

Exide Technologies 3000 Montrose Avenue Reading, PA 19605

www.exideworld.com

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 43 (April 2002)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of April 2002 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During April 2002 to Comply with the Consent Decree
- On April 1, 2002, RMC submitted the progress report for March 2002.
- On April 19, 2002, IDEM granted RMC an extension of time for a response to IDEM's comments contained in their letter dated December 20, 2001.
- 2. Results of Sampling and Tests and Other Data Received During April 2002
- No results or data were received during April 2002.
- 3. Percentage of Closure Completed as of April 30, 2002

As of April 30, 2002, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During April 2002
- As indicated previously, Exide requested and IDEM granted an extension for RMC to submit responses to IDEM comments dated December 20, 2001.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for May 2002
- RMC will respond to IDEM's comments contained in their December 20, 2001 letter.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs

cc: Jonathan Adenuga - EPA Robert Steinwurtzel Paul Stratman



Exide Technologies 3000 Montrose Avenue Reading, PA 19605

hyvisv.exideworld.cem

April 1, 2002

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re: Progress Report No. 42 (March 2002)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of March 2002 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During March 2002 to Comply with the Consent Decree
- On March 1, 2002, RMC received a letter from IDEM granting an extension of time to respond to IDEM's comments contained in IDEM's December 20, 2001 letter.
- On March 4, 2002, RMC submitted the progress report for February 2002.
- 2. Results of Sampling and Tests and Other Data Received During March 2002
- No results or data were received during March 2002.
- 3. Percentage of Closure Completed as of March 31, 2002

As of March 31, 2002, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During March 2002
- No modifications to Work Plans were proposed or approved during March 2002.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for April 2002
- RMC will respond to IDEM's comments outlined in IDEM's December 20, 2001 letter.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs

Jonathan Adenuga - EPA Robert Steinwurtzel Paul Stratman

cc:



March 4, 2002

Edda Yanhaqqalas 19 Japan - 20 Japan 20 Japan - 20 G

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re: Progress Report No. 41 (February 2002)

SWMU Closure

Refined Metals Corporation Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of February 2002 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During February 2002 to Comply with the Consent Decree
- On February 7, 2002, RMC submitted a written request to IDEM for extension of the deadline to respond to IDEM comments dated December 20, 2001.
- On February 8, 2002, RMC submitted the progress report for January 2002.
- 2. Results of Sampling and Tests and Other Data Received During February 2002
- Laboratory results for the December 2001 sampling events have been received and upon validation and evaluation; results will be compiled in a report and submitted to IDEM and USEPA.

3. Percentage of Closure Completed as of February 28, 2002

As of February 28, 2002, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During February 2002
- No modifications to Work Plans were proposed or approved during February 2002.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for March 2002
- Laboratory results from the December 2001 sampling events have been received and upon validation and evaluation; results will be compiled in a report and submitted to IDEM and USEPA.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A.

Director - Environmental Affairs



Exide Technologies 19-09 Montrose Avenue Reminu, PA (1960)

February 4, 2002

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 40 (January 2002)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of January 2002 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During January 2002 to Comply with the Consent Decree
- On January 4, 2002, RMC submitted the progress report for December 2001.
- A community newsletter was generated in January 2002 and submitted to list of interested individuals as provided by IDEM and USEPA.
- 2. Results of Sampling and Tests and Other Data Received During January 2002
- Laboratory results for the December 2001 sampling events have been received and upon validation and evaluation; results will be compiled in a report and submitted to IDEM and USEPA.
- 3. Percentage of Closure Completed as of January 31, 2002

As of January 31, 2002, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report.

Mrs. Rebecca Joniskan, CHMM February 4, 2002

On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During January 2002
- No modifications to Work Plans were proposed or approved during January 2002.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for February 2002
- Laboratory results for the December sampling events have been received and upon validation and evaluation; results will be compiled in a report and submitted to IDEM and USEPA.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- A community newsletter was generated in January 2002 and submitted to list of interested individuals as provided by IDEM and USEPA.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs

Mrs. Rebecca Joniskan, CHMM February 4, 2002

cc: Jonathan Adenuga - EPA Robert Steinwurtzel Paul Stratman



Exide Technologies

100 Montous Reconstruction 96 19695

Texts and smith and

January 4, 2002

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re: Progress Report No. 39 (December 2001)

SWMU Closure

Refined Metals Corporation Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of December 2001 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During December 2001 to Comply with the Consent Decree
- On December 7, 2001, RMC submitted the progress report for November 2001.
- On December 20, 2001, RMC received IDEM's comments on the response to comments submitted by Advanced GeoServices Corporation to IDEM on October 2, 2001.
- AGC completed nine geoprobe boring within the limits of the SWMUs to more accurately
 define the vertical limits of impact from past facility operations. These borings were
 performed pro-actively by RMC based on a revised workplan submitted to IDEM on October
 2, 2001.
- 2. Results of Sampling and Tests and Other Data Received During December 2001
- No results or other data was received in December 2001. Laboratory results for the December sampling events are expected in mid-January and upon validation and evaluation; results will be compiled in a report and submitted to IDEM and USEPA.
- 3. Percentage of Closure Completed as of December 31, 2001
- As of December 31, 2001, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999

Mrs. Rebecca Joniskan, CHMM January **4**, 2002

and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report. On December 20, 2001, IDEM issued comments based on their most recent review of the revisions to the Closure Investigation Report submitted by RMC in the August 17, 2001, and October 2, 2001 comment letters to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During December 2001
- No modifications to Work Plans were proposed or approved during December 2001.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for January 2002
- Laboratory results for the December sampling events are expected in mid-January and upon validation and evaluation; results will be compiled in a report and submitted to IDEM and USEPA.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- A community newsletter will be generated in January 2002 and submitted to list of interested individuals as provided by IDEM and USEPA.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information,

Mrs. Rebecca Joniskan, CHMM January 4, 2002

including the possibility of fine and imprisonment for knowing violations.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs

cc: Jonathan Adenuga - EPA

Robert Steinwurtzel

Paul Stratman



Exide Technologies
1000 Mentiose Avenue
Ceading PA 13605

www. szideworla cam

December 7, 2001

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 38 (November 2001)

SWMU Closure

Refined Metals Corporation Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of November 2001 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During November 2001 to Comply with the Consent Decree
- On November 6, 2001, RMC submitted the progress report for October 2001.
- 2. Results of Sampling and Tests and Other Data Received During November 2001
- No results or other data was received in November 2001.
- 3. Percentage of Closure Completed as of November 30, 2001

As of November 30, 2001, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. On October 2, 2001, RMC issued a revision to the revised Closure Investigation Report and submit to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During November 2001
- No modifications to Work Plans were proposed or approved during November 2001.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for December 2001
- No tasks are scheduled for December 2001.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs



Exide Technologies 3000 Montrose Avenue Beading, PA 19605

vrow exideworld com

November 6, 2001

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 37 (October 2001)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

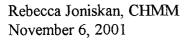
Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of October 2001 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During October 2001 to Comply with the Consent Decree
- On October 2, 2001, Advanced GeoServices Corporation issued responses to the August 17, 2001 IDEM comments.
- On October 9, 2001, RMC submitted the progress report for September 2001.
- 2. Results of Sampling and Tests and Other Data Received During October 2001
- No results or other data was received in October 2001.
- 3. Percentage of Closure Completed as of October 31, 2001

As of October 31, 2001, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.





- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During October 2001
- No modifications to Work Plans were proposed or approved during October 2001.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for November 2001
- No tasks are scheduled for November 2001.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs





Exide Technologies 1996 Mobile & Average Regalled, PA 1994

Litera Anthonyusid I ner

October 9, 2001

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 36 (September 2001)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of September 2001 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During September 2001 to Comply with the Consent Decree
- On September 10, 2001, RMC submitted the progress report for August 2001.
- 2. Results of Sampling and Tests and Other Data Received During September 2001
- No results or other data was received in September 2001.
- 3. Percentage of Closure Completed as of September 30, 2001

As of September 30, 2001, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation was sent to IDEM. On August 17, 2001, IDEM issued additional comments concerning the revised Closure Investigation Report. RMC is currently preparing an additional revision to the revised Closure Investigation Report to submit to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.



Rebecca Joniskan, CHMM October 9, 2001

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During September 2001
- No modifications to Work Plans were proposed or approved during September 2001.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for October 2001
- RMC is currently preparing a response to IDEM comments (August 17, 2001) and revise the Closure Investigation Report accordingly.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs





Exide Technologies

5000 Montrose Avenue Reading, PA 19605

www.exideworld.com

July 6, 2001

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 33 (June 2001)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

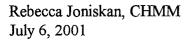
Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of June 2001 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During June 2001 to Comply with the Consent Decree
- On June 5, 2001, RMC submitted the progress report for May 2001.
- 2. Results of Sampling and Tests and Other Data Received During June 2001
- No results or other data was received in June 2001.
- 3. Percentage of Closure Completed as of June 30, 2001

As of June 30, 2001, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation has been sent to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.





- 5. Modifications to Work Plans Proposed to or Approved by IDEM During June 2001
- No modifications to Work Plans were proposed or approved during June 2001.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for July 2001
- No actions are planned or anticipated until IDEM completes its review of the Closure Investigation Report.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs







Fax' (610) 921-4062

Exide Technologies 3000 Montrose Avenue Reading, PA 19605

www.exideworld.com

June 5, 2001

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 32 (May 2001)

SWMU Closure

Refined Metals Corporation Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of May 2001 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During May 2001 to Comply with the Consent Decree
- On May 1, 2001, RMC submitted the progress report for April 2001.
- 2. Results of Sampling and Tests and Other Data Received During May 2001
- No results or other data was received in May 2001.
- 3. Percentage of Closure Completed as of May 31, 2001

As of May 31, 2001, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation has been sent to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.





Rebecca Joniskan, CHMM June 5, 2001

- 5. Modifications to Work Plans Proposed to or Approved by IDEM During May 2001
- No modifications to Work Plans were proposed or approved during May 2001.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for June 2001
- No actions are planned or anticipated until IDEM completes its review of the Closure Investigation Report.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A Love

Director - Environmental Affairs

cc:





Exide Technologies 1000 Montrose Avenue Reading, PA 19605

www.eduevraid.com

May 1, 2001

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 31 (April 2001)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

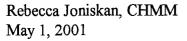
Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of April 2001 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During March 2001 to Comply with the Consent Decree
- On April 5, 2001, RMC submitted the progress report for March 2001.
- 2. Results of Sampling and Tests and Other Data Received During April 2001
- No results or other data was received in April 2001.
- 3. Percentage of Closure Completed as of April 30, 2001

As of April 30, 2001, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation has been sent to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.





- 5. Modifications to Work Plans Proposed to or Approved by IDEM During April 2001
- No modifications to Work Plans were proposed or approved during April 2001.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for May 2001
- No actions are planned or anticipated until IDEM completes its review of the Closure Investigation Report.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. L/øve-

Director - Environmental Affairs





January 8, 2001

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 27 (December 2000)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of December 2000 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During December 2000 to Comply with the Consent Decree
- On December 4, 2000, RMC submitted the progress report for November 2000.
- 2. Results of Sampling and Tests and Other Data Received During December 2000
- No results or other data was received in December 2000.
- 3. Percentage of Closure Completed as of December 31, 2000

As of December 31, 2000, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation has been sent to IDEM. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.

P.O. Box 14205 • Reading, PA 19612-4205 645 Penn Street • Reading, PA 19601 (610) 378-0500 www.exideworld.com







Rebecca Joniskan, CHMM January 8, 2001

- 5. Modifications to Work Plans Proposed to or Approved by IDEM During December 2000
- No modifications to Work Plans were proposed or approved during December 2000.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for January 2001
- No actions are planned or anticipated until IDEM completes its review of the Closure Investigation Report.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- No community relations activities were performed during December 2000. The third newsletter summarizing RFI activities is currently being developed and will be mailed (January 2001) to interested parties included on the mailing list previously provided to the EPA.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

EXIDE TECHNOLOGIES

Matthew A. Love

Director - Environmental Affairs



EXIDE CORPORATION

November 6, 2000

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 25 (October 2000)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of October 2000 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During October 2000 to Comply with the Consent Decree
- On October 2, 2000, IDEM issued a letter acknowledging receipt of the Closure Investigation Reported dated June 1, 2000. IDEM letter also listed four inadequacies to the Closure Investigation Report, including a request for additional QA/QC documentation. The requested documentation was mailed to IDEM on October 20, 2000.
- On October 6, 2000, RMC submitted the progress report for September 2000.
- 2. Results of Sampling and Tests and Other Data Received During October 2000
- No results or other data was received in October 2000.
- 3. Percentage of Closure Completed as of October 31, 2000

As of October 31, 2000, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM reviewed the Closure Investigation Report and issued a letter listing certain inadequacies, including a request for additional QA/QC documentation. The requested documentation has been sent to IDEM. The percentage of Closure completed

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cannot be estimated, as the eventual effort required to complete Closure is uncertain.

- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During October 2000
- No modifications to Work Plans were proposed or approved during October 2000.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for November 2000
- No actions are planned or anticipated until IDEM completes its review of the Closure Investigation Report.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- Not applicable this reporting period.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

EXIDE TECHNOLOGIES

Director - Environmental Affairs

Jonathan Adenuga - EPA Robert Steinwurtzel Paul Stratman

cc:



September 6, 2000

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 23 (August 2000)

SWMU Closure

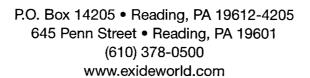
Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of August 2000 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During August 2000 to Comply with the Consent Decree
- On August 4, 2000, RMC submitted the progress report for July 2000.
- 2. Results of Sampling and Tests and Other Data Received During August 2000
- No results or other data was received in August 2000.
- 3. Percentage of Closure Completed as of August 31, 2000
- As of August 31, 2000, two versions of the Closure Plan had been submitted to, and reviewed
 by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was
 approved on February 9, 2000. The Closure Plan was implemented and the Closure
 Investigation Report was issued on June 1, 2000. IDEM is currently reviewing the Closure
 Investigation Report. The percentage of Closure completed cannot be estimated, as the
 eventual effort required to complete Closure is uncertain.
- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.









Rebecca Joniskan, CHMM September 6, 2000

- 5. Modifications to Work Plans Proposed to or Approved by IDEM During August 2000
- No modifications to Work Plans were proposed or approved during August 2000.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for September 2000
- No actions are planned or anticipated until IDEM completes its review of the Closure Investigation Report.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- The second newsletter summarizing RFI and closure activities was mailed (July 2000) to interested parties included on the mailing list previously provided to the EPA. Included in the newsletter was a public opinion survey for feedback on the existing RFI and closure activities.

I certify under penalty of perjury that the information contained in or accompanying this progress report is, to the best of my knowledge after thorough investigation, true, accurate, and complete. I am aware that there are significant penalties for submitting false information. including the possibility of fine and imprisonment for knowing violations.

Sincerely,

EXIDE CORPORATION

Director - Environmental Affairs







August 4, 2000

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

De.

Progress Report No. 22 (July 2000)

SWMU Closure

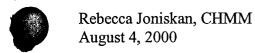
Refined Metals Corporation Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of July 2000 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During July 2000 to Comply with the Consent Decree
- On July 5, 2000, RMC submitted the progress report for June 2000.
- 2. Results of Sampling and Tests and Other Data Received During July 2000
- No results or other data was received in July 2000.
- 3. Percentage of Closure Completed as of July 31, 2000
- As of July 31, 2000, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. The Closure Plan was implemented and the Closure Investigation Report was issued on June 1, 2000. IDEM is currently reviewing the Closure Investigation Report. The percentage of Closure completed cannot be estimated, as the eventual effort required to complete Closure is uncertain.
- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.





- 5. Modifications to Work Plans Proposed to or Approved by IDEM During July 2000
- No modifications to Work Plans were proposed or approved during July 2000.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for August 2000
- No actions are planned or anticipated until IDEM completes its review of the Closure Investigation Report.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- The second newsletter summarizing RFI and closure activities was mailed (July 2000) to interested parties included on the mailing list previously provided to the EPA. Included in the newsletter was a public opinion survey for feedback on the existing RFI and closure activities.

Sincerely,

EXIDE CORPORATION

Matthew A. Love

Director - Environmental Affairs





July 5, 2000

Rebecca Joniskan, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 21 (June 2000)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Mrs. Joniskan:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of June 2000 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During June 2000 to Comply with the Consent Decree
- On June 1, 2000, Advanced GeoServices Corporation (AGC), on behalf of Refined Metals Corporation (RMC), submitted the Closure Investigation Report to IDEM.
- On June 9, 2000, RMC submitted the progress report for May 2000.
- 2. Results of Sampling and Tests and Other Data Received During June 2000
- No results or other data was received in June 2000.
- 3. Percentage of Closure Completed as of June 30, 2000
- As of June 30, 2000, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and was approved on February 9, 2000. RMC is currently implementing the Closure Plan. The percentage of Closure completed cannot be estimated as the eventual effort required to complete Closure is uncertain.





- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.
- 5. Modifications to Work Plans Proposed to or Approved by IDEM During June 2000
- No modifications to Work Plans were proposed or approved during June 2000.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for July 2000
- No actions are planned or anticipated until IDEM completes its review of the Closure Investigation Report.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- No community relations activities were performed during June 1999. The second newsletter summarizing RFI activities will be mailed (July 2000) to interested parties included on the mailing list previously provided to the EPA. Included in the newsletter will be a public opinion survey for feedback on the existing RFI activities.

Sincerely,

EXIDE CORPORATION

Director - Environmental Affairs



EXIDE CORPORATION

August 6, 1999

Rebecca M. Eifert, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 10 (July 1999)

SWMU Closure

Refined Metals Corporation

Beech Grove, Indiana

Dear Ms. Eifert:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of July 1999 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During July 1999 to Comply with the Consent Decree
- On July 1, 1999, Refined Metals submitted the progress report for June 1999.
- On July 17, 1999, Refined Metals submitted Closure Plan revisions to IDEM. These revisions were made in response to IDEM's Notice of Deficiency dated June 17, 1999.
- 2. Results of Sampling and Tests and Other Data Received During July 1999
- No sampling, tests, or other data was received during July 1999.
- 3. Percentage of Closure Completed as of July 31, 1999
- As of July 31, 1999, none of the Closure had been completed. As of that date, two versions of the Closure Plan had been submitted to, and reviewed by IDEM. A third version of the Closure Plan was submitted to IDEM in July 1999 and is currently being reviewed by IDEM.
- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.

645 Penn Street Reading, PA 19601 P.O. Box 14205 Reading, PA 19612-4205 610/378-0500 www.exideworld.com/power



- 5. Modifications to Work Plans Proposed to or Approved by IDEM During July 1999
- A third version of the Closure Plan was proposed to IDEM during July 1999.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for August 1999
- Exide intends to begin implementation of the Closure Plan at risk during August 1999.
- 8. <u>Unresolved Delays Encountered</u>
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- No community relations activities were performed during July 1999.

Very truly yours,

EXIDE CORPORATION

Matthew A. Love

Manager - Regulatory Affairs

cc: Jonathan Adenuga - EPA Robert Steinwurtzel Paul Stratman Mark Werthman

EXIDE CORPORATION

November 3, 1998

Rebecca M. Eifert, CHMM Indiana Department of Environmental Management P.O. Box 6015 Indianapolis, IN 46206-6015

Re:

Progress Report No. 1 (October 1998)

SWMU Closure

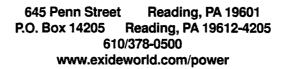
Refined Metals Corporation

Beech Grove, Indiana

Dear Ms. Eifert:

Pursuant to the intent of paragraph 64 of the consent decree entered August 31, 1998, this progress report for activities completed during the month of October 1998 is submitted to the Indiana Department of Environmental Management (IDEM).

- 1. Actions Taken During October 1998 to Comply with the Consent Decree
- On October 1, 1998, Refined Metals met with representatives of IDEM to discuss closure activities for the facility.
- On October 12, 1998, Refined Metals submitted the Closure Plan to IDEM.
- 2. Results of Sampling and Tests and Other Data Received During October 1998
- No sampling, tests, or other data was received during October 1998.
- 3. Percentage of Closure Completed as of October 31, 1998
- As of October 31, 1998, none of the Closure had been completed. As of that date, only the Closure Plan had been submitted to IDEM for review.
- 4. Problems or Potential Problems Encountered and Actions Taken to Rectify Problems
- To date, no problems or potential problems have been encountered.



- 5. Modifications to Work Plans Proposed to or Approved by IDEM During October 1998
- No modifications were proposed or approved in October 1998.
- 6. Changes in Personnel
- To date, there has been no change in personnel.
- 7. Tasks and Actions Scheduled for November 1998
- Work on the Closure by Refined Metals will resume upon receipt of IDEM comments on the Closure Plan.
- 8. Unresolved Delays Encountered
- To date, no unresolved delays have been encountered.
- 9. Community Relations Activities
- To date, Refined Metals has not performed any community relations activities.

Very truly yours,

EXIDE CORPORATION

Matthew A. Love

Manager - Regulatory Affairs

cc: Jonathan Adanuga - EPA
Robert Steinwurtzel
Paul Stratman
Mark Werthman